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Mr. David Wadell Executive Secretary Tennessee Regulatory Authority 460 James Robertson Parkway Nashville TN 37243-0505

TN REGULATORY AUTHORITY

Dear Mr. Wadell:

99-00454

In accordance with the Federal Communications Commission's (FCC) Order, Scott County Telephone Cooperative submits its IntraLATA Toll Dialing Parity Implementation Plan for the Tennessee Regulatory Authority's approval.

If you have any questions regarding this information or wish to discuss it further, please contact Daniel E. Odom at (540) 452-9119.

Sincerely,

SCOTT COUNTY TELEPHONE COOPERATIVE

Vaniel & Odom

Daniel E. Odom

Assistant Executive VP & Manager

Enclosure: \$25.00 Registration Fee

SCOTT COUNTY TELEPHONE COOPERATIVE

IntraLATA Presubscription Implementation Plan LATA 244

INTRODUCTION

99-00454

In accordance with the Federal Communications Commission (FCC) Second Report and Order, dated August 8, 1996, Scott County Telephone Cooperative (SCTC) submits this Implementation Plan for intraLATA Presubscription in LATA 244.

Currently, SCTC completes all 1 + or 0 + intraLATA toll traffic, unless the caller dials an access code to route the call to a carrier other than SCTC. IntraLATA presubscription will allow customers to select their carrier for intraLATA toll calling and dial 1 + and 0 + and have their calls automatically routed to their presubscribed carrier.

IMPLEMENTATION TIMING

SCTC plans to implement intraLATA presubscription coincident with it's provision of interLATA toll services on July 1, 1999. Implementation will be done simultaneously in all central offices on a flash cut basis. SCTC will notify carriers sixty (60) to ninety (90) days in advance of the implementation date. SCTC will inform customers of intraLATA presubscription through a neutrally-worded bill insert that customers will receive thirty (30) days prior to the implementation date.

METHODOLOGY

SCTC plans to implement intraLATA presubscription using the full Two-PIC option. This will allow customers the flexibility to presubscribe to one carrier for intraLATA toll calling and to potentially presubscribe to a different carrier for interLATA calling. All intraLATA toll calls, including operator handled calls (0 + intraLATA number) and 1-NPA-555-1212 will be subject to presubscription. SCTC or an alternative local exchange carrier will handle 0 + local, 0 -, three digit calls such as 411 and 911, seven digit local calls, and usage based seven digit Expanded Local Calling Plan Calls.

CUSTOMER SELECTION PROCESS

New customers, and existing customers adding an additional line, will be asked to make a intraLATA PIC choice at the time they order service. If a customer cannot decide on an intraLATA carrier at that time or does not wish to presubscribe, they will be assigned a "no-PIC" and will have to dial an access code to make intraLATA toll calls. These customers will then have ninety (90) days to select an intraLATA carrier without being charged for a PIC change. SCTC proposes there be no balloting and allocation for existing customers' selection of an intraLATA toll carrier. All current customers will remain presubscribed to SCTC until they initiate a change of their intraLATA toll carrier. SCTC will not charge existing customers for their first PIC change made during the first ninety (90) days after presubscription is implemented.

SCTC will charge \$5.00 for an intraLATA PIC change, the same amount as the tariffed interstate PIC change and \$5.00 per line for a service order charge.

CARRIER REQUIREMENTS

All intraLATA toll carriers will be required to have a valid Access Carrier Name Abbreviation (ACNA) assigned by Bellcore. All intraLATA toll carriers will be required to have a valid Carrier Identification Code (CIC). The CIC is a four digit access identification code that is assigned by the North American Numbering Plan (NANP) Administrator for the use with Feature Group B or D Switched Access Service. The CIC is used to identify the toll provider.

All intraLATA toll carriers must have a Feature Group D (FGD) or Feature Group D-like trunk and a letter of intent on file with SCTC to be a presubscribed intraLATA toll provider. Carriers can use existing FGD trunks to carry their inter/intraLATA toll traffic when they use the interLATA CIC for intraLATA toll. Each carrier must determine if additional facilities are needed to handle the intraLATA toll traffic and then submit Access Service Requests if necessary.

SCTC will require a signed Letter of Authorization from the customer prior to the conversion of all carrier requested PIC changes.

EXCHANGE OF INFORMATION

IntraLATA toll carriers have the option of submitting business and residence PIC change requests mechanically via the Equal Access Mechanized Interface (EAMI) or manually via the Equal Access Point of Contact. Orders must be submitted in the industry-approved Customer Account Record Exchange (CARE) format.

SCTC will use the industry-approved CARE process to exchange information with participating intraLATA toll providers. This will be the same information currently provided to interLATA carriers. The existing report will be expanded to include intraLATA PIC related information. The data includes a list of all customers who sign up and disconnect from the carrier. The report is available on paper, tape, or by electronic transmission.

COST RECOVERY

SCTC does not plan to recover any incremental costs in implementing intraLATA toll parity.